

# inter-office communication

to: Jeff Mayhugh, RCRA Enforcement Section, DSHWM-CO date: June 30, 1989  
from: Michael Eggert through Jan Carlson, DGW-CO  
subject: L-Tec Welding & Cutting Systems - May 17, 1989 Ground Water Monitoring Data

At the request of Jeff Mayhugh, DSHWM, I reviewed the ground water data submitted by L-Tec to determine if the submittal would nullify any of the violations as cited in the Notice of Violation (NOV) letter sent to the facility on April 14, 1989.

The ground water data submitted does not nullify any of the previous violations as described in the NOV. The data submitted did include quadruplicate sampling and analyses of the indicators of ground water contamination parameters which had not been done in the past.

In addition, L-Tec agreed to modify their ground water sampling and analysis procedures to include field filtration. The information submitted indicated that only after all the samples were collected, the samples were filtered. The Filtration & Preservation Section of the revised ground water sampling protocol developed for L-Tec by Wadsworth Laboratory states that "Samples requiring filtration (eg. dissolved metals) should be done immediately after sample collection. If a field filtering system is inoperable or unavailable, do not preserve the sample. Filtering will be done as soon as possible after returning to the laboratory". L-Tec must modify their procedures and ground water sampling protocol to include field filtering at the wellhead immediately after extracting the sample from each monitoring well.

cc: Tom Allen, DGW  
Mike Savage/Dave Sholtis, DSHWM  
Debbie Berg/Kay Springer, DSHWM-NEDO  
Chris Khourey/Joe Biaglow, DGW-NEDO

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